



LEVITT LAW
A PROFESSIONAL CORPORATION

FEB 09 2017

February 3, 2017

WM El Sobrante Landfill Attn: Cody Cowgill Facility Owner 10910 Dawson Canyon Rd. Corona, CA 92883	CT Corporation System Agent for Service of Process USA Waste of California, Inc. 818 West Seventh St., Ste. 930 Los Angeles, CA 90017
Catherine McCabe Administrator U.S. Environmental Protection Agency Mail Code: 110 IA 1200 Pennsylvania Avenue, N.W. Washington, DC 20460	Kurt V. Berchtold Executive Officer Santa Ana Regional Water Quality Control Board 3737 Main Street, Suite 500 Riverside, CA 92501-3348
Alexis Strauss Regional Administrator U.S. EPA, Region 9 75 Hawthorne Street San Francisco, CA 94105	Thomas Howard Executive Director P.O. Box 100 1001 I Street Sacramento, CA 95812-0100

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

To Whom It May Concern:

Levitt Law, APC ("Levitt Law") represents Our Clean Waters ("OCW"), a non-profit corporation organized under the laws of the State of California. This letter is to give notice that Levitt Law, on behalf of OCW, intends to file a civil action against WM El Sobrante Landfill, Inc. ("El Sobrante") for violations of the Federal Water Pollution Control Act, 33 U.S.C. § 1251 *et seq.* ("Clean Water Act" or "CWA") at El Sobrante's Facility located at 10910 Dawson Canyon Road, Corona, CA 92883 (the "Facility").

OCW is concerned with the environmental health of the Dawson Creek Temescal Wash ("Dawson Creek"), the Santa Ana River, and the Pacific Ocean, on behalf of the public that uses and enjoys said Water Bodies, its inflows, outflows, and other waters of the Affected Watershed. The public's use and enjoyment of these waters is negatively affected by the pollution caused by El Sobrante's operations. Additionally, OCW acts in the interest of the general public to prevent pollution in these waterways, for the benefit of their ecosystems, and for the benefits of all individuals and communities who use these waterway for various recreational, educational, and spiritual purposes.

This letter addresses El Sobrante's unlawful discharge of pollutants from the Facility via an indirect method into the Dawson Creek, the Santa Ana River, and eventually into the Pacific Ocean. Specifically, investigation of the Facility has uncovered significant, ongoing, and continuous violations of the CWA and the National Pollutant Discharge Elimination System

("NPDES") Industrial General Permit No CAS000001 (State Water Resources Control Board) Water Quality Orders No. 2014-0057-DWQ ("Industrial General Permit") and 92-12-DWQ (as amended by Order No. 97-03-DWQ) ("Previous Industrial General Permit").¹

CWA section 505(b) requires that sixty (60) days prior to the initiation of a civil action under CWA section 505(a), notice must be given to file suit. 33 U.S.C. § 1365(b). Notice must be given to the alleged violator, the U.S. Environmental Protection Agency ("EPA"), and the State in which the violations occur. As required by section 505(b), this Notice of Violation and Intent to File Suit provides notice to El Sobrante of the violations that have occurred and which continue to occur at the Facility. After the expiration of sixty (60) days from the date of this Notice of Violation and the Intent to File Suit, OCW intends to file suit in federal court against El Sobrante under CWA section 505(a) for the violations described more fully below.

During the 60-day notice period, OCW is willing to discuss effective remedies for the violations noticed in this letter. We suggest that El Sobrante contact OCW's attorneys at Levitt Law within the next twenty (20) days, so that these discussions may be completed by the conclusion of the 60-day notice period. Please note that we do not intend to delay the filing of a complaint in federal court, and service of the complaint shortly thereafter, even if discussions are continuing when the notice period ends. Implementation of curative measures and the absolute stopping of all violations would have to occur to delay such court filing.

I. THE LOCATION OF THE ALLEGED VIOLATIONS

A. The Facility

El Sobrante's Facility is located at 10910 Dawson Canyon Road, Corona, CA 92883 and does business with the Facility name of "WM El Sobrante Landfill." At the Facility, El Sobrante operates as a waste disposal company. The standard industrial classification code that applies to the Facility is 4953. El Sobrante utilizes the following materials at the Facility: diesel fuel, gasoline, lubricants, transmission fluid, antifreeze, originating from the trucking and transportation of the waste it handles. El Sobrante's disposal sight has an innumerable amount of polluting materials that become hazardous to the ecosystem following storm event discharges. El Sobrante also conducts the following industrial activities at the Facility: operation of dumps; collection and processing of garbage; operation of a landfill; collection and disposal of rubbish, and the like. The Facility collects municipal solid waste, construction and demolition debris, electronic waste, appliances, yard waste, and treated wood waste.

Possible pollutants from the Facility include pH, Total Suspended Solids ("TSS"), Oil and Grease ("O&G"), Aluminum ("Al"), Iron ("Fe"), Lead ("Pb"), Zinc ("Zn") and other pollutants. Stormwater from the Facility discharges, via the local storm sewer system and/or surface runoff indirectly into the Dawson Creek where it eventually meets the Orange County coastline.

B. The Affected Water

The pollutants are received by the Dawson Creek, the Santa Ana River, and then finally enter into Pacific Ocean. The CWA requires that water bodies such as the Dawson Creek, the Santa Ana River, and the Pacific Ocean meet water quality objectives that protect specific "beneficial

¹ On April 1, 2014, the State Water Resources Control Board adopted an updated NPDES General Permit for Discharges Associated with Industrial Activity, Water Quality Order No. 2014-57-DWQ, which has taken force or effect on its effective date of July 1, 2015. As of the effective date, Water Quality Order No. 2014-57-DWQ has superseded and rescinded the prior Industrial General Permit except for purposes of enforcement actions brought pursuant to the prior permit.

uses.” For example, the beneficial uses of the Santa Ana River Watershed include contact and noncontact water recreation, protection of endangered species, spawning, marine habitat, estuarine habitat, etc. Contaminated stormwater from the Facility adversely affects the water quality of the Dawson Creek, Santa Ana River, Pacific Ocean, and the overall Affected Watershed, and threatens the beneficial uses and ecosystems of these waters, which includes habitats for threatened or endangered species.

II. THE FACILITY'S VIOLATIONS OF THE CLEAN WATER ACT

It is unlawful to discharge pollutants to waters of the United States, such as the Dawson Creek, the Santa Ana River, and the Pacific Ocean without an NPDES permit or in violation of the terms and conditions of an NPDES permit. CWA § 301(a), 33 U.S.C. § 1311(a); *see also* CWA § 402(p), 33 U.S.C. § 1342(p) (requiring NPDES permit issuance for the discharge of stormwater associated with industrial activities). The Industrial General Permit authorizes certain discharges of stormwater, conditioned on compliance with its terms.

El Sobrante has submitted a Notice of Intent (“NOI”) to be authorized to discharge stormwater from the Facility under the Industrial General Permit since at least 2014. However, information available to OCW indicates that stormwater discharges from the Facility have violated several terms of the Industrial General Permit and the CWA. Apart from discharges that comply with the Industrial General Permit, the Facility lacks NPDES permit authorization for any other discharges of pollutants into waters of the United States.

A. Discharges in Excess of BAT/BCT Levels

The Effluent Limitations of the Industrial General Permit prohibit the discharge of pollutants from the Facility in concentrations above the level commensurate with the application of best available technology economically achievable (“BAT”) for toxic pollutant² and best conventional pollutant control technology (“BCT”) for conventional pollutants.³ Industrial General Permit, Section I (D) (32), II (D) (2); Previous Industrial General Permit Order, Part B (3). The EPA has published Numeric Action Level (NAL) values in the current Industrial General Permit (also known as Benchmark values in the Previous Industrial General Permit) set at the maximum pollutant concentration present if an industrial Facility is employing BAT and BCT, listed in Attachment 1 to this letter.⁴ Additionally, the Previous Industrial General Permit notes that effluent limitation guidelines for several named industrial categories have been established and codified by the Federal Government. See Previous Industrial General Permit, Section VIII. The Previous Industrial General Permit mandates that for facilities that fall within such industrial categories, compliance with the listed BAT and BCT for the specified pollutant parameters listed therein must be met in order to be in compliance with the Previous Industrial General Permit. *Id.* El Sobrante falls within these named industrial categories and it must have complied with the effluent limitations found therein in order to have been in compliance with the Previous Industrial General Permit during its effective period. Based on El Sobrante’s self-reporting data and/or lack thereof, El Sobrante has not met this requirement and was in violation of the Previous Stormwater Permit over a period of at least three (3) years. The current Industrial General Permit NAL Values are listed in Attachment 2 to this letter.

² BAT is defined at 40 C.F.R. § 437.1 et seq. Toxic pollutants are listed at 40 C.F.R. § 401.15 and include copper, lead, and zinc, among others.

³ BCT is defined at 40 C.F.R. § 437.1 et seq. Conventional pollutants are listed at 40 C.F.R. § 401.16 and include BOD, TSS, O&G, and pH.

⁴ The Benchmark values are part of the EPAs Multi-Sector General Permit (“MSGP”). See 73 Fed. Reg. 56,572 (Sept. 29, 2008) (Final National Pollutant Discharge Elimination System (NPDES) General Permit for Stormwater Discharges From Industrial Activities).

El Sobrante's self-reporting of industrial stormwater discharges shows a pattern of exceedances of Benchmarks and NAL values, especially as it pertains to the parameters of Iron, Total Suspended Solids, and Specific Conductance. See Attachment 3. This pattern of exceedances of Benchmarks and NAL values indicate that El Sobrante has failed and is failing to employ measures that constitute BAT and BCT in violation of the requirements of the Industrial General Permit and Previous Industrial General Permit. OCW alleges and notifies El Sobrante that its stormwater discharges from the Facility have consistently contained and continue to contain levels of pollutants that exceed Benchmark Values for Iron, Total Suspended Solids, and Specific Conductance. El Sobrante's ongoing discharges of stormwater containing levels of pollutants above EPA Benchmark values, and BAT and BCT based levels of control, also demonstrate that El Sobrante has not developed and implemented sufficient Best Management Practices ("BMPs") at the Facility. Proper BMPs could include, but are not limited to, moving certain pollution-generating activities under cover or indoors, capturing and effectively filtering or otherwise treating all stormwater prior to discharge, frequent sweeping to reduce build-up of pollutants on-site, installing filters on downspouts and storm drains, and other similar measures.

El Sobrante's failure to develop and/or implement adequate pollution controls to meet BAT and BCT at the Facility violates and will continue to violate the CWA and the Industrial General Permit each and every day El Sobrante discharges stormwater without meeting BAT/BCT. OCW alleges that El Sobrante has discharged stormwater containing excessive levels of pollutants from the Facility to the Dawson Creek and into the Santa Ana River, eventually leading to the Pacific Ocean during significant local rain events over 0.2 inches in the last three (3) years.⁵ Every significant rain event that has occurred in the last three (3) years represents a discharge of polluted stormwater run-off into the Dawson Creek, the Santa Ana River, and then into the Pacific Ocean. El Sobrante is subject to civil penalties for each violation of the Industrial General Permit and the CWA within the past three (3) years.

B. Discharges Impairing Receiving Waters

The Industrial General Permit's Discharge Prohibitions disallow stormwater discharges that cause or threaten to cause pollution, contamination, or nuisance. See Industrial General Permit, Section III; Previous Industrial General Permit Order, Part A (2). The Industrial General Permit also prohibits stormwater discharges to surface or groundwater that adversely impact human health or the environment. See Industrial General Permit, Section VI (b-c); Previous Industrial General Permit Order, Part C (1). Receiving Water Limitations of the Industrial General Permit prohibit stormwater discharges that cause or contribute to an exceedance of applicable Water Quality Standards ("WQS") contained in a Statewide Water Quality Control Plan or the applicable Regional Water Board's Basin Plan. See Industrial General Permit, Section VI (a); Previous Industrial General Permit Order, Part C (2). Applicable WQS are set forth in the California Toxic Rule ("CTR")⁵ and Chapter 3 of the Los Angeles Region (Region 4) Water Quality Control Plan (the "Basin Plan").⁶ Exceedances of WQS are violations of the Industrial General Permit, the CTR, and the Basin Plan.

The Basin Plan establishes WQS for all Inland Surface Waters, including the Affected Water Body Watershed, which contain, but are not limited, to the following:

⁵ The CTR is set forth at 40 CF.R. § 131.38 and is explained in the Federal Register preamble accompanying the CTR promulgation set forth at 65 Fed. Reg. 31, 682 (May 18, 2000).

⁶ The Basin Plan is published by the Santa Ana Regional Water Quality Control Board and can be accessed at <http://www.waterboards.ca.gov>.

- Waters shall not contain suspended or settleable material in concentrations that cause nuisance or adversely affect beneficial users.
- Waters shall be free of changes in turbidity that cause nuisance or adversely affect beneficial uses. Increases in natural turbidity attributable to controllable water quality factors shall not exceed 20% where natural turbidity is between 0 and 50 nephelometric turbidity units ("NTU"), and shall not exceed 10% where the natural turbidity is greater than 50 NTU.
- All waters shall be maintained free of toxic substances in concentrations that are toxic to, or that produce detrimental physiological responses in, human, plant, animal, or aquatic life.
- Surface waters shall not contain concentrations of chemical constituents in amounts that adversely affect any designated beneficial use.

OCW alleges that El Sobrante's stormwater discharges have caused or contributed to exceedances of Receiving Water Limitations in the Industrial General Permit and the WQS set forth in the Basin Plan and CTR. These allegations are based on El Sobrante's self-reported data submitted to the Santa Ana Regional Water Quality Control Board. These sampling results indicate that El Sobrante's discharges are causing or threatening to cause pollution, contamination, and/or nuisance; adversely impacting human health or the environment; and violating applicable WQS. For example, El Sobrante's sampling results indicate exceedances of WQS for Iron, TSS and Specific Conductance, and others, as listed in Attachment 3.

OCW alleges that each day that El Sobrante has discharged stormwater from the Facility, El Sobrante's stormwater has contained levels of pollutants that exceeded one or more of the Receiving Water Limitations and/or applicable WQS in Dawson Creek and the Affected Watershed. OCW alleges that El Sobrante has discharged stormwater exceeding Receiving Water Limitations and/or WQS from the Facility to the Dawson Creek, the Santa Ana River, the Pacific Ocean, and the Affected Watershed during significant local rain events over 0.2 inches in the last three (3) years. Each discharge from the Facility that violates a Receiving Water Limitation or has caused or contributed, or causes or contributes, to an exceedance of an applicable WQS constitutes a separate violation of the Industrial General Permit and the CWA. El Sobrante is subject to penalties for each violation of the Industrial General Permit and the CWA within the past three (3) years.

C. Failure to Develop and Implement an Adequate Stormwater Pollution Prevention Plan

The Industrial General Permit requires dischargers to develop and implement an adequate Storm Water Pollution Prevention Plan ("SWPPP"). See Industrial General Permit, Section X (B); Previous Industrial General Permit, Part A (I) (a). The Industrial General Permit also requires dischargers to make all necessary revisions to the existing SWPPP promptly. See Industrial General Permit, Section X (B); Previous Industrial General Permit Order, Part E (2). The SWPPP must include, among other requirements, the following: a site map, a list of significant materials handled and stored at the site, a description and assessment of all El Sobrante pollutant sources, a description of the BMPs that will reduce or prevent pollutants in stormwater discharges, specification of BMPs designed to reduce pollutant discharge to BAT and BCT levels, a comprehensive site compliance evaluation completed each reporting year, and revisions to the SWPPP within 90 days after a Facility manager determines that the SWPPP is in violation of any requirements of the Industrial General Permit. See Industrial General Permit, Section X (A); Previous Industrial General Permit, Part A.

Based on information available to OCW, El Sobrante has failed to prepare and/or implement an adequate SWPPP and/or failed to revise the SWPPP to satisfy each of the requirements stated in Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit. For Example, El Sobrante's SWPPP does not include and/or El Sobrante has not implemented adequate BMPs designed to reduce pollutant levels in discharges to BAT and BCT levels in accordance with Section A (8) of the Industrial General Permit as evidenced by the data in Attachment 3. Accordingly, El Sobrante has violated the CWA each and every day that it has failed to develop and/or implement an adequate SWPPP meeting all of the requirements of Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit, and El Sobrante will continue to be in violation every day until it develops and implements an adequate SWPPP. El Sobrante is subject to penalties for each violation of the Industrial General Permit and the CWA occurring within the past three (3) years.

D. Failure to Develop and Implement an Adequate Monitoring and Reporting Program and to Perform Annual Comprehensive Site Compliance Evaluations

The Industrial Stormwater Permit requires Facility operators to develop and implement a Monitoring Implementation Program ("MIP"). See Industrial General Permit, Section XI; Previous Industrial General Permit, Section B (I) and Order, Part E (3). The Industrial General Permit requires that the MIP ensure that the Facility's stormwater discharges comply with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations specified in the Industrial General Permit. *Id.* Facility operators must ensure that their MIP practices reduce or prevent pollutants in stormwater and authorized non-stormwater discharges as well as evaluate and revise their practices to meet changing conditions at the Facility. *Id.* This may include revising the SWPPP as required by Section X (A) of the Industrial General Permit and/or the corresponding Section of the Previous Industrial General Permit.

The MIP must measure the effectiveness of BMPs used to prevent or reduce pollutants in stormwater and authorized non-stormwater discharges, and Facility operators must revise the MIP whenever appropriate. See Industrial General Permit, Section XI; Previous Industrial General Permit, Section B. The Industrial General Permit requires Facility operators to visually observe and collect samples of stormwater discharges from all drainage areas. *Id.* Facility operators are also required to provide an explanation of monitoring methods describing how the Facility's monitoring program will satisfy these objectives. *Id.*

El Sobrante has been operating the Facility with an inadequately developed and/or inadequately implemented MIP, in violation of the substantive and procedural requirements set forth in Section B of the Industrial General Permit. For example, the data in Attachment 3 indicates that El Sobrante's monitoring program has not ensured that stormwater discharges are in compliance with the Discharge Prohibitions, Effluent Limitations, and Receiving Water Limitations of the Industrial General Permit as required by the Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B. The monitoring has not resulted in practices at the Facility that adequately reduce or prevent pollutants in stormwater as required by the Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B. Similarly, the data in Attachment 3 indicates that El Sobrante's monitoring program has not effectively identified or responded to compliance problems at the Facility or resulted in effective revision of the BMPs in use or the Facility's SWPPP to address such ongoing problems as required by Industrial General Permit, Section XI and/or the Previous Industrial General Permit, Section B.

As a result of El Sobrante's failure to adequately develop and/or implement an adequate MIP at the Facility, El Sobrante has been in daily and continuous violation of the Industrial Stormwater Permit and the CWA each and every day for the past three (3) years. These violations are ongoing. El Sobrante will continue to be in violation of the monitoring and reporting requirement each day that El Sobrante fails to adequately develop and/or implement an effective MIP at the Facility. El Sobrante is subject to penalties for each violation of the Industrial General Permit and the CWA occurring for the last three (3) years.

E. Unpermitted Discharges

Section 301(a) of the CWA prohibits the discharge of any pollutant into waters of the United States unless the discharge is authorized by an NPDES Permit issued pursuant to Section 402 of the CWA. See 33 U.S.C. § 1311 (a), 1342. El Sobrante sought coverage for the Facility under the Industrial General Permit, which states that any discharge from an industrial Facility not in compliance with the Industrial General Permit must be either eliminated or permitted by a separate NPDES permit. Industrial General Permit, Section III; Previous Industrial General Permit Order, Part A (1). Because El Sobrante has not obtained coverage under a separate NPDES permit and has failed to eliminate discharges not permitted by the Industrial General Permit, each and every discharge from the Facility described herein, not in compliance with the Industrial General Permit, has constituted and will continue to constitute a discharge without CWA Permit coverage in violation of section 301 (a) of the CWA, 33 U.S.C. § 131 I(a).

III. PERSON RESPONSIBLE FOR THE VIOLATIONS

WMEI Sobrante Landfill is responsible of the violations at the Facility located at 10910 Dawson Canyon Road, Corona CA 92883 and described above.

IV. NAME AND ADDRESS OF NOTICING PARTY

OUR CLEAN WATERS

Laura Meldere, Executive Director
9465 Wilshire Blvd., Suite 300
Beverly Hills, CA 90212
Phone: 424-284-4085
Email: info@ourcleanwaters.com

V. LEGAL COUNSEL

Levitt Law, APC
Scott L. Levitt, Esq.
scott@levittlawca.com
311 Main Street, Suite #8
Seal Beach, CA 90740
T: (562) 493-7548
F: (562) 493-7562

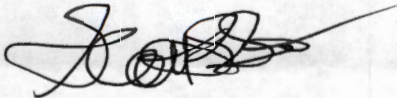
VI. REMEDIES

As stated previously, OCW intends, at the close of the 60-day notice period or thereafter, to file suit under CWA section 505(a) against El Sobrante for the above-referenced violations. OCW will seek declaratory and injunctive relief to prevent further CWA violations pursuant to CWA sections 505(a)

and (d), 33 U.S.C. § 1365(a) and (d), and such other relief as permitted by law. In addition, OCW will seek civil penalties pursuant to CWA section 309(d), 33 U.S.C. § 1319(d), and 40 C.F.R. § 19.4, against El Sobrante in this action. **The CWA imposes civil penalty liability of up to \$37,500 per day, per violation for violations occurring after January 12, 2009, plus attorneys' fees and costs** (33 U.S.C. § 1319(d); 40 C.F.R. § 19.4). Just going back a period of three years, with your seven days per week operations would amount to a sum no less than \$41,062,500.00. OCW will seek to recover such penalties, restitution, attorneys' fees, experts' fees, and costs in accordance with CWA section 505(d), 33 U.S.C. § 1365(d).

As noted above, OCW and its Counsel are willing to meet with you during the 60-day notice period to discuss effective remedies for the violations noted in this letter. Please contact me to initiate these discussions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Scott L. Levitt', with a stylized flourish extending to the right.

Scott L. Levitt, Esq.

ATTACHMENT 1: U.S. EPA Benchmarks of Acceptable Levels

Parameter Name	EPA Benchmark: Acceptable Range
pH	6 to 9
Total Suspended Solids	Below 100 mg/L
Specific Conductance	Below 200 umhos/cm
TOC	Below 100mg/L
Aluminum	Below 0.75 mg/L
Zinc	Below .117 mg/L
Iron	Below 1.0 mg/L
Copper	Below 0.0636 mg/L
Lead	Below 0.0816 mg/L
COD	Below 120 mg/L
Nitrogen Ammonia	Below 19 mg/L
Nitrate + Nitrite Total	Below .68 mg/L
BOD	Below 30 mg/L

ATTACHMENT 2: Industrial General Permit - Parameter NAL Values

Industrial General Permit Order

TABLE 2: Parameter NAL Values, Test Methods, and Reporting Units

PARAMETER	TEST METHOD	REPORTING UNITS	ANNUAL NAL	INSTANTANEOUS MAXIMUM NAL
pH*	See Section XI.C.2	pH units	N/A	Less than 6.0 Greater than 9.0
Suspended Solids (TSS)*, Total	SM 2540-D	mg/L	100	400
Oil & Grease (O&G)*, Total	EPA 1664A	mg/L	15	25
Zinc, Total (H)	EPA 200.8	mg/L	0.26**	
Copper, Total (H)	EPA 200.8	mg/L	0.0332**	
Cyanide, Total	SM 4500-CN C, D, or E	mg/L	0.022	
Lead, Total (H)	EPA 200.8	mg/L	0.262**	
Chemical Oxygen Demand (COD)	SM 5220C	mg/L	120	
Aluminum, Total	EPA 200.8	mg/L	0.75	
Iron, Total	EPA 200.7	mg/L	1.0	
Nitrate + Nitrite Nitrogen	SM 4500-NO3- E	mg/L as N	0.68	
Total Phosphorus	SM 4500-P B+E	mg/L as P	2.0	
Ammonia (as N)	SM 4500-NH3 B+ C or E	mg/L	2.14	
Magnesium, total	EPA 200.7	mg/L	0.064	
Arsenic, Total (c)	EPA 200.8	mg/L	0.15	
Cadmium, Total (H)	EPA 200.8	mg/L	0.0053**	
Nickel, Total (H)	EPA 200.8	mg/l	1.02**	
Mercury, Total	EPA 245.1	mg/L	0.0014	
Selenium, Total	EPA 200.8	mg/L	0.005	
Silver, Total (H)	EPA 200.8	mg/L	0.0183**	
Biochemical Oxygen Demand (BOD)	SM 5210B	mg/L	30	

SM – Standard Methods for the Examination of Water and Wastewater, 18th edition

EPA – U.S. EPA test methods

(H) – Hardness dependent

* Minimum parameters required by this General Permit

**The NAL is the highest value used by U.S. EPA based on their hardness table in the 2008 MSGP.

ATTACHMENT 3: Table of Exceedances for El Sobrante (Page 1 of 2)

ANNUAL TABLE OF PARAMETERS	
Iron	1 mg/L
Total Suspended Solids	Below 100mg/L
Specific Conductance	Below 200 umhos/cm
Oil and Grease	15mg/L

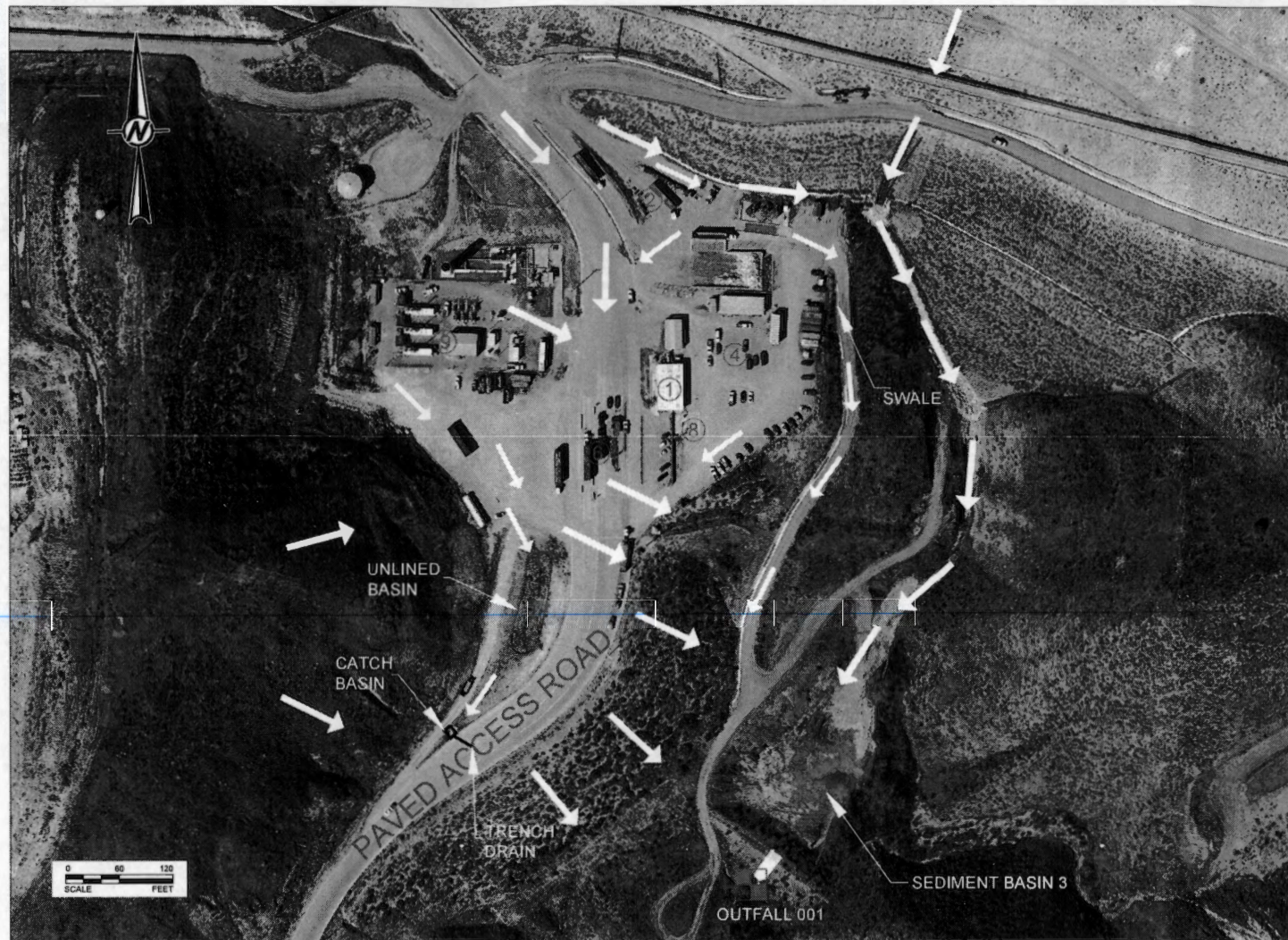
Date	Parameters Tested	
2/28/14	Iron	790
		65
		12
		AVG: 289mg/L
	Specific Conductance	540
		190
		500
		AVG: 410umhos/cm
	Total Suspended Solids (TSS)	2,600
		1800
		240
		AVG: 1,547mg/L
12/12/14	Iron	4.2
		AVG: 4.2mg/L
	Specific Conductance	750
		AVG: 750mg/L
9/15/15	Iron	1.4
		1.5
		AVG: 1.45mg/L
1/05/16	Iron	160
		390
		9.7
		14
		AVG: 143mg/L
	TSS	5400
		7500
		210
		280
		AVG: 3348mg/L
	Oil and Grease	17

		4.8
		ND
		ND
		AVG: 10.9mg/L
1/06/16	Iron	170
		160
		AVG: 165 mg/L
	TSS	5400
		2900
		AVG: 4150mg/L
	Oil and Grease	2.8
		2.0
		AVG: 2.4mg/L
12/16/16	Iron	94
		110
		14
		1.8
		AVG: 55mg/L
	TSS	2800
		2200
		270
		47
		AVG: 1329mg/L
12/22/16	Iron	7
		6.6
		83
		9.1
		16
		75
		AVG: 33mg/L
	TSS	74
		98
		5500
		190
		210
		1200
		AVG: 1212mg/L

Average NAL Exceedances From 2014 Reports	
Iron	216.8mg/L
TSS	1,800mg/L Instantaneous Exceedance Average
Specific Conductance	295.1umhos/cm
Oil and Grease	NA

Average NAL Exceedances From 2015 Report	
Iron	1.45 mg/L
TSS	NA
Specific Conductance	NA
Oil and Grease	NA

Average NAL Exceedances From 2016 Reports	
Iron	82mg/L
TSS	6,050mg/L Instantaneous Exceedance Average
Specific Conductance	NA
Oil and Grease	None



LEGEND

- ① ADMINISTRATIVE TRAILER
- ② E WASTE/CRT COLLECTION AREA
- ③ LIQUID HANDLING TANK FARM VEHICLE
- ④ PARKING AREA
- ⑤ FLARE
- ⑥ SCALES AND GUARD BUILDING
- ⑦ RECYCLABLE WASTE
- ⑧ AST AND FUELING STATION
- ⑨ GAS PLANT
- ☐ STORMWATER SAMPLING LOCATIONS
- ➔ GENERAL FLOW DIRECTION TOWARDS BASINS/DISCHARGE OUTFALL

01 2014-11-17 Site Entrance Area
 Rev. YYYY-MM-DD DESCRIPTION

CMH EC 0000 0000
 PREPARED DESIGN REVIEW APPROVED

CLIENT
 WASTE MANAGEMENT
 10910 DAWSON CANYON RD
 CORONA, CA 92606
 CORONA TRIST



www.golden.com

PROJECT
 EL SOBRANTE LANDFILL
 10910 DAWSON CANYON RD
 CORONA, CA 92606
 TITLE
 SITE ENTRANCE AREA

PROJECT No.
 1405406.20

CONTROL

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FIGURE

5



- LEGEND**
- ① MAINTENANCE BUILDING
- SWALE
- ➔ GENERAL FLOW DIRECTION TOWARDS BASINS/DISCHARGE OUTFALL

CLIENT
WASTE MANAGEMENT
10910 DAWSON CANYON RD
CORONA, CA 92683

CONSULTANT

PROJECT
EL SOBRANTE LANDFILL
10910 DAWSON CANYON RD
CORONA, CA 92683

TITLE
MAINTENANCE AREA

01 2014-11-17 MAINTENANCE AREA

Rev. YYYY-MM-DD DESCRIPTION

CJM EC 0000 0000

PREPARED DESIGN REVIEW APPROVED



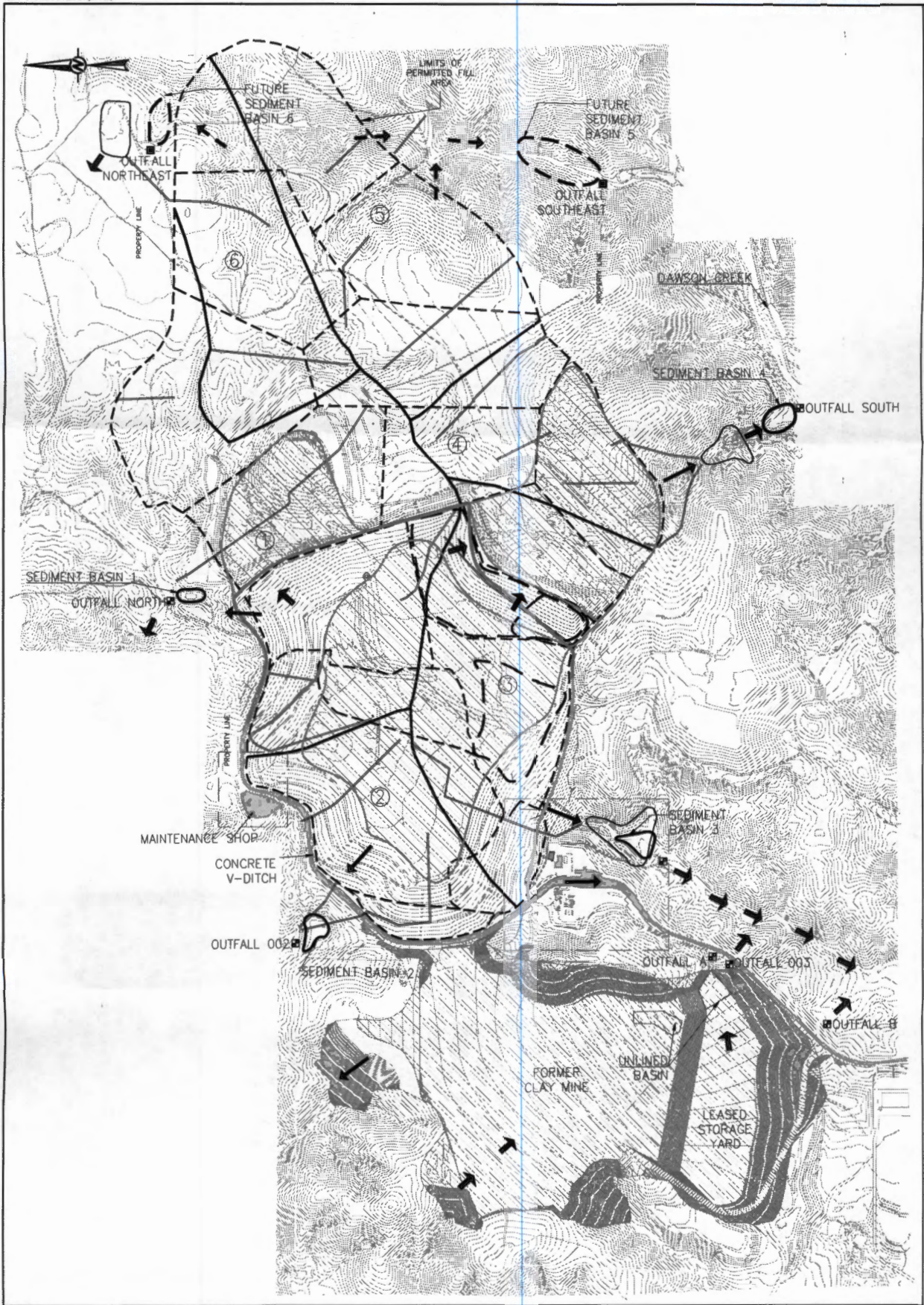
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PROJECT No.
1405406.20

CONTROL

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FIGURE 4



01 2016-11-17 SITE MAP REVISIONS
 Rev. YYYY-MM-DD DESCRIPTION
 CLIENT
 WASTE MANAGEMENT
 10910 DAWSON CANYON RD
 CORONA, CA 92883
 CONSULTANT



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CMN EC EC 0000
 PREPARED DESIGN REVIEW APPROVED
 PROJECT
 EL SOBRANTE LANDFILL
 10910 DAWSON CANYON RD
 CORONA, CA 92883
 TITLE
 SITE PLAN

PROJECT NO.
 1405406.20

CONTROL

Rev. 1 of 1

FIGURE
 3

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LEGEND

- ★ SITE LOCATION
- WATERSHED BOUNDARY AND HYDROLOGIC UNIT

NOTES

REFERENCE

1. SERVICE LAYER CREDITS: CONTENT MAY NOT REFLECT NATIONAL GEOGRAPHIC'S CURRENT MAP POLICY. SOURCES: NATIONAL GEOGRAPHIC, ESRI, DELORME, HIRE, UNEP-WCMC, USGS, NASA, ESA, METI, NRCAN, GEBCO, NOAA, INCREMENT P CORP.
 SOURCE: ESRI, DIGITAL GLOBE, GEBCO, I-CIBED, USGS, USGS, AEX, GETMAPPING, AEROGRIID, IGN, IEP, SV 1888TOPO, AND THE GIS USER COMMUNITY
 2. COORDINATE SYSTEM: NAD 1983 STATEPLANE CALIFORNIA

CLIENT

WASTE MANAGEMENT

PROJECT

EL SOBRANTE LANDFILL (CORONA, CA)

TITLE

SITE VICINITY MAP

CONSULTANT



YYYY-MM-DD 2014-11-14

PREPARED DEF

DESIGN DEF

REVIEW OK

APPROVED TB

PROJECT No. 1405406.35

CONTROL

REVIEW

FIGURE 2